

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-cv-21291 DSL

SHELBY MAYES,

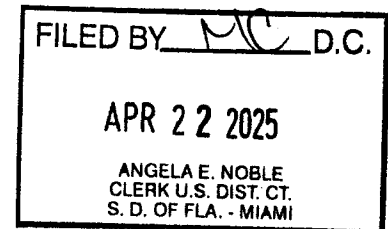
Plaintiff,

vs.

J & J GREEN PAPER, INC. AND  
MICHAEL SCOTT SEGAL,

Defendants.

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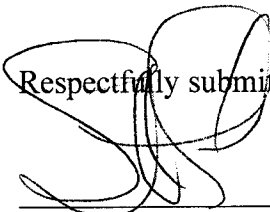
**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

Defendant, J & J Green Paper, Inc. respectfully requests an extension of sixteen [16] days to respond to the Complaint filed on March 20, 2025. The current deadline for filing an answer to the complaint for J & J Green Paper, Inc. is April 22, 2025. The current deadline to file an answer for Michael Scott Segal is May 8, 2025, based upon service of the summons. Defendant, Michael Scott Segal, is in the process of retaining counsel for both Defendants and requests the Court to extend the deadline for J & J Green Paper to respond to the Complaint through counsel on May 8, 2025, to align the response date for both Defendants.

Opposing counsel was contacted regarding this request and does not oppose the extension of time to May 8, 2025.

This is Defendant's first request for an extension. This motion is not made for the purposes of delay but to ensure a fair opportunity to obtain legal representation.

Respectfully submitted,

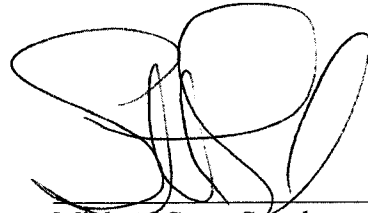


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Michael Scott Segal  
J & J Green Paper, Inc.  
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(305) 381-0096  
[scott@jjgreenpaper.com](mailto:scott@jjgreenpaper.com)

CERTIFICATE OF SERVICE

On April 22, 2025, I hand-delivered the Motion for Extension of Time to the Clerk's Office for the Southern District of Florida and provided a copy to counsel of record via email at [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com).



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Michael Scott Segal